

REMARKS

The Examiner is thanked for the examination of the application. In view of the foregoing amendments and the remarks that follow, the Examiner is respectfully requested to reconsider and withdraw the outstanding rejections.

Claims 1 - 7 (presumably claims 1 - 17) are rejected under 35 USC 102(e) or alternatively 35 USC 103(a), as being allegedly unpatentable over US 2004/0070782, hereinafter *Mihara*.

The Examiner appears to contend that the applications 21 through 26 of *Mihara* corresponds to the claimed first control program. The Examiner also appears to contend that the API 51 or the WEB service function (WSF) 27 of *Mihara* corresponds to the claimed second control program. It is noted, however, that both the API 51 and the WSF 27 merely pass to SF 28 a processing request that is received from an external source with the use of SOAP. Neither the WSF 27, nor the API 51, passes processing requests to the structure alleged to correspond to the claimed first control program. Thus, the cited portions *Mihara* fail to disclose that the second control program is configured to pass the received processing request to the first control program.

Furthermore, independent claims 1, 7, and 13 have been amended to clarify that the second control program includes a second API for receiving, with use of a function publicly released in advance, a third request relating to image processing from an external source, and converts the received third request to a command supported by the first API. New claim 18 recites, among other features, that the second control program includes a second API for receiving, with use of a publicly released function, a third request relating to image processing from an external

source, and converts the received third request to a command supported by the first API. And, new claim 19 adds that the second API is an external API for controlling operations of the hardware resource according to requests received from an external device.

Mihara is totally silent on the features that a function is publicly released in advance and that a request relating to image processing is received from an external source using the function.

Accordingly, the Examiner is respectfully requested to reconsider and withdraw the pending rejections, and to find the new claims in condition for allowance.

In the event that there are any questions concerning this Amendment, or the application in general, the Examiner is respectfully urged to telephone the undersigned attorney so that prosecution of the application may be expedited.

Respectfully submitted,

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